1	David II. Isliegel, Loy.					
2	Nevada Bar No. 9086					
	HAINES & KRIEGER, LLC					
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6	Email: dkrieger@hainesandkrieger.com					
7	Attorney for Plaintiff					
8	David J. Olesczuk					
9						
	UNITED STATES DISTRICT COURT					
10	DISTRICT OF NEVADA					
11	DISTRICT OF	THEVADA				
12	David J. Olesczuk	CACE NO . 2.16 01000 CMN				
	David J. Olesczuk	CASE NO.: <u>2:16-cv-01008-GMN-</u> <u>NJK</u>				
13	Plaintiff,	11312				
14						
15	VS.	PLAINTIFF'S MOTION FOR				
16		CLERK'S ENTRY OF DEFAULT				
	CITIZENS ONE HOME LOANS; PHH	AS TO DEFENDANT CITIZENS				
17	MORTGAGE SERVICE CENTER;	ONE HOME LOANS				
18	EQUIFAX INFORMATION SERVICES,					
19	LLC; EXPERIAN INFORMATION					
	SOLUTIONS, INC,					
20	Defendant.					
21		odyna 55(a) Dlaintiff hanshy mayor that				
22	Pursuant to Federal Rule of Civil Proc	redure 55(a), Plaintiff hereby moves that				
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## Case 2:16-cv-01008-GMN-NJK Document 19 Filed 07/25/16 Page 2 of 5

1	the Clerk of the Court enter the default of Defendant Citizens One Home Loans. Th					
2	request is supported by the accompanying Declaration of David H. Krieger, Esq.					
3	Dated:	July 22, 2016				
4		•	Resp	ectfully Submitted,		
5			_	NES & KRIEGER, LLC		
6						
7			By:	/s/ David H. Krieger, Esq.		
8				David H. Krieger, Esq. Counsel for Plaintiff		
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1 2 3 4 5 6	David H. Krieger, Esq. Nevada Bar No. 9086 HAINES & KRIEGER, LLC 8985 S. Eastern Avenue, Suite 350 Henderson, Nevada 89123 Tel: (702) 880-5554 Fax: (702) 385-5518 Email: dkrieger@hainesandkrieger.com			
7 8	Attorney for Plaintiff			
9	David J. Olesczuk  UNITED STATES DISTRICT COURT			
10	DISTRICT OF NEVADA			
11	DISTRICT OF NEVADA			
12 13	David J. Olesczuk Plaintiff,	CASE NO.: <u>2:16-cv-01008-GMN-</u> <u>NJK</u>		
14	vs.	DECLARATION IN SUPPORT OF		
15	CITIZENS ONE HOME LOANS; PHH MORTGAGE SERVICE CENTER;	PLAINTIFF'S MOTION FOR CLERK'S ENTRY OF DEFAULT		
16	EQUIFAX INFORMATION SERVICES, AS TO DEFENDANT CITIZENS			
17	LLC; EXPERIAN INFORMATION SOLUTIONS, INC,			
18 19	Defendant.			
20				
21	STATE OF NEVADA ) ss.			
22	COUNTY OF CLARK )			
23	I, David H. Krieger, being duly sworn, depose and say:			
24	1. I am counsel for the Plaintiff in	the above matter		
25	1. I am counsel for the Plaintiff in	the above matter.		
26	2. This Declaration is based on my	own personal knowledge and I am		
27	competent to testify as to the ma	atters herein.		
28				

1	3.	The Plaintiff's complaint in this matter was filed on 5/04/2016.
2 3	4.	Thereafter, summons and complaint was served upon Defendant Citizens
4		One Home Loans on 5/25/2016. See Affidavit of Process Server, attached
5		One frome Boans on 3/23/2010. See figure of Frocess Server, academed
6		hereto as "Exhibit 1".
7	5.	Defendant Citizens One Home Loans has failed to answer Plaintiff's
8		complaint or otherwise appear before the Court in this matter.
9		
10	6.	Accordingly, the Plaintiff, through me, hereby requests that this Court
11		enter DEFAULT on Defendant Citizens One Home Loans in the above
12		entitled action.
13		
14	7.	I declare under penalty of perjury that the foregoing is true and correct.
15		Executed on July 22, 2016
16		By: /s/ David H. Krieger, Esq.
17		David H. Krieger, Esq.
18 19		Nevada Bar No. 9086
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1 **CERTIFICATE OF SERVICE** 2 I, David H. Krieger, hereby certify that on July 22, 2016, I caused a true and 3 accurate copy of the foregoing document entitled, PLAINTIFF'S MOTION FOR 4 5 CLERK'S ENTRY OF DEFAULT, to be served by first-class United States mail, 6 upon the following: 7 8 **Citizens One Home Loans** 10561 Telegraph Rd. 9 Glen Allen, VA 23059 10 11 I hereby further certify that on July 22, 2016, I caused a true and accurate copy 12 of the foregoing document to be served via email addresses to the following 13 14 recipients: 15 Bob L. Olson, Esq. 16 bolson@swlaw.com 17 **Snell & Wilmer** Attorneys for Defendant Experian Information Solutions, Inc. 18 19 Sylvia O. Semper, Esq. sempers@ballardspahr,com 20 Ballard Spahr, LLP 21 **Attorneys for Defendant PHH Mortgage Service Center** 22 23 Dated: July 22, 2016 24 25 /s/David H. Krieger\_ 26 An Employee of Haines & Krieger, LLC 27 28